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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

MARIA GUADALUPE CORTES
JIMENEZ,

Plaintiff,

vs.

KILOLO KIJAKAZI, Acting
Commissioner of Social Security,

Defendant.

Case No. 1:22-cv-01344-BAM

STIPULATION AND ~~PROPOSED~~
ORDER FOR SECOND
EXTENSION OF TIME

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from April 6, 2023 to June 5, 2023, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Good cause exists for the requested extension. For the weeks of March 27, 2023 and April 3, 2023, Counsel currently has 31 merit briefs, and several letter briefs and reply

1 briefs. This includes cases that undersigned counsel took on during co-counsel's,
2 Dolly M. Trompeter, leave of absence. Additional time is needed to thoroughly
3 brief this matter for the Court.

4 Counsel for Plaintiff is currently taking partial leave as his child was born on
5 October 14, 2022. Thus, Counsel is working limited hours.

6 Additionally, Counsel underwent major surgery on March 15, 2023,
7 requiring post-op physical therapy, with the need for several breaks throughout the
8 workday.

9 Defendant does not oppose the requested extension. Counsel apologizes to
10 the Defendant and Court for any inconvenience this may cause.

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13 Respectfully submitted,

14 Dated: March 30, 2023

PENA & BROMBERG, ATTORNEYS AT LAW

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16 By: /s/ Jonathan Omar Pena
17 JONATHAN OMAR PENA
18 Attorneys for Plaintiff

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20
21 Dated: March 30, 2023

PHILLIP A. TALBERT
United States Attorney
MATHEW W. PILE
Associate General Counsel
Office of Program Litigation
Social Security Administration

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26 By: */s/ Franco L. Becia
27 Franco L. Becia
28 Special Assistant United States Attorney
Attorneys for Defendant

(*As authorized by email on March 30, 2023)

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ORDER

Pursuant to the parties' stipulation, and cause appearing, Plaintiff's request for an extension of time to file and serve a Motion for Summary Judgment is GRANTED. Plaintiff shall file her Motion for Summary Judgment on or before June 5, 2023. All other deadlines in the Court's Scheduling Order are modified accordingly.

IT IS SO ORDERED.

Dated: April 5, 2023

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE